

EXHIBIT 1



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

JAN 27 2022

DON NEWBERRY, Court Clerk
STATE OF OKLAHOMA TULSA COUNTY

MOHAMMED OMAR,

Plaintiff,

v.

BRITTEN PRODUCTIONS, LLC,
a Foreign For Profit Limited Liability
Corporation, WOODLAND HILLS
MALL, LLC, a Foreign For Profit
Limited Liability Company, AND
SIMON PROPERTY GROUP, INC.,
a Foreign For Profit Corporation,

Defendants.

CJ-2022-00278
CASE NO.:

DOUG DRUMMOND

ATTORNEY LIEN CLAIMED

JURY TRIAL DEMANDED

PETITION

COMES NOW Plaintiff Mohammed Omar and for his causes of action against Britten Productions LLC (hereinafter referred to as "Britten"), Woodland Hills Mall LLC (hereinafter "Woodland Hills"), and Simon Property Group (hereinafter "Simon") allege and state as follows:

JURISDICTION, PARTIES & VENUE

Plaintiff Mohammed Omar is a resident of Tulsa County, Oklahoma.

Defendants Britten is a Foreign For Profit Professional Corporation, with its principal place of business in Traverse City, Michigan, and its registered agent is the Oklahoma Secretary of State, 2300 North Lincoln Blvd., Suite 101, Oklahoma City, OK 73105.

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3. Defendant Woodland Hills is a Foreign For Profit Corporation, with its principle place of business in Indianapolis, Indiana, and its registered agent is The Corporation Company, 1833 S. Morgan Road, Oklahoma City, OK 73128.
4. Defendant Simon is a Foreign For Profit Corporation, with its principal place of business in Indianapolis, Indiana, and its registered agent is The Corporation Company, 1833 S. Morgan Road, Oklahoma City, OK 73128.
5. The subject incident that led to Plaintiff's cause of action occurred at Woodland Hills in Tulsa County, Oklahoma.
6. Jurisdiction is proper in the State of Oklahoma District Court since the Plaintiff is a resident of Oklahoma, and Defendants are non-residents with sufficient minimum contacts with the state.
7. Venue is proper in the Tulsa County District Court pursuant to Okla. Stat. tit. 12 § 187, which states an action "where all defendants are nonresidents of the state may be brought in the county where the cause of action arose."

FACTUAL ALLEGATIONS

8. The allegations contained in the previous paragraphs are incorporated by reference.
9. On or around March 6th, 2020, Mohammed Omar was working at Pholicious Vietnamese Rice Noodle Soup Café located inside of the Woodland Hills Mall in Tulsa, Oklahoma.
10. Woodland Hills is managed by Simon.
11. During Mr. Omar's shift, a piece of metal approximately three feet long and three inches wide fell from a sign hanging above him and struck him in the upper back.
12. Britten, or representatives thereof, travelled to Tulsa to install the sign.

13. Britten was responsible for the maintenance of the sign.
14. Plaintiff suffered numerous back injuries as a result of the incident, and he still suffers from said injuries.

**FIRST CLAIM FOR RELIEF: PREMESIS LIABILITY
(Against Woodland Hills and Simon)**

15. Plaintiff realleges and incorporates by reference the preceding paragraphs for all purposes the same as if set forth herein verbatim.
16. As set forth above, Defendants owed a duty to Mr. Omar, an invitee, to use ordinary care to keep the premises in a reasonably safe condition for the use of invitees.
17. On or about March 6th, 2020, Defendants failed to exercise ordinary care to keep its premises in a reasonably safe condition for the use of invitees.
18. Defendants breached their duty by allowing the sign to remain in an unsafe condition and they failed to warn Mr. Omar of the same. Defendants knew, or should have known, about the dangerous condition of the sign.
19. Plaintiff has been injured as a direct and proximate result of the Defendant's breach of duty. Plaintiff has suffered serious personal injuries, lost wages, other personal and financial damages, pain and suffering, and/or loss of enjoyment of life, all in an amount in excess of seventy-five-thousand dollars (\$75,000).

**SECOND CLAIM FOR RELIEF: NEGLIGENCE
(Against all Defendants)**

20. Plaintiff realleges and incorporates by reference the preceding paragraphs for all purposes the same as if set forth herein verbatim.
21. Defendants owed a duty to Mr. Omar to use ordinary care to keep both the premises and the sign therein in a reasonably safe condition.

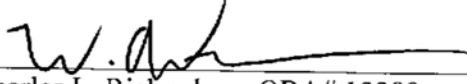
22. On or about March 6th, 2020, Defendants breached their duty by allowing the billboard unit to remain in an unsafe condition. As a direct and proximate result of the Defendants' breach of duty, Mr. Omar suffered serious personal injuries, lost wages, other personal and financial damages, pain and suffering, and/or loss of enjoyment of life, all in an amount in excess of seventy-five-thousand dollars (\$75,000).

REQUEST FOR RELIEF/DAMAGES

WHEREFORE, Plaintiffs respectfully request this Court enter judgment against Defendants, Britten, Woodland Hills, and Simon, for an award of compensatory damages in an amount in excess of seventy-five-thousand dollars (\$75,000). Plaintiffs further request this Court grant Plaintiffs any and all pre-judgment and post-judgment interest on any award of judgment at the current statutorily allowed rate until paid. Finally, Plaintiffs request this Court grant expenses and attorneys' fees properly related to this action, along with all other relief this Court deems just and proper.

Respectfully submitted,

RICHARDSON RICHARDSON BOUDREAUX

A handwritten signature in black ink, appearing to read "W. Anderson", is written over a horizontal line.

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